

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

Zohar III, Corp., *et al.*,¹
Debtors.

ZOHAR CDO 2003-1, LIMITED; ZOHAR II
2005-1, LIMITED; and ZOHAR III, LIMITED;
ZOHAR II 2005-1, CORP.,

Plaintiffs,
-against-

PATRIARCH PARTNERS, LLC;
PATRIARCH PARTNERS VIII, LLC;
PATRIARCH PARTNERS XIV, LLC;
PATRIARCH PARTNERS XV, LLC;
PHOENIX VIII, LLC; OCTALUNA LLC;
OCTALUNA II LLC; OCTALUNA III LLC;
ARK II CLO 2001-1, LIMITED; ARK
INVESTMENT PARTNERS II, LP; ARK
ANGELS VIII, LLC; PATRIARCH PARTNERS
MANAGEMENT GROUP, LLC; PATRIARCH
PARTNERS AGENCY SERVICES, LLC; and
LYNN TILTON,

Defendants, and

180S, INC.; BLACK MOUNTAIN DOORS,
LLC; CROSCILL HOME, LLC; DURO
TEXTILES, LLC; GLOBAL AUTOMOTIVE
SYSTEMS, LLC; HERITAGE AVIATION,
LTD.; INTREPID U.S.A., INC.; IMG
HOLDINGS, INC.; JEWEL OF JANE, LLC;
MOBILE ARMORED VEHICLES, LLC;
SCAN-OPTICS, LLC; SILVERACK, LLC;
STILA STYLES, LLC; SNELLING STAFFING,
LLC; VULCAN ENGINEERING, INC; and
XPIENT SOLUTIONS, LLC,

Nominal Defendants.

Chapter 11

Case No. 18-10512 (KBO)
Jointly Administered

Adversary No. 20-50534 (KBO)

Re: Adv. Docket No. 188

¹ The “Debtors,” and, where applicable, the last four digits of their taxpayer identification number are as follows: Zohar III, Corp. (9612), Zohar II 2005-1, Corp. (4059), Zohar CDO 2003-1, Corp. (3724), Zohar III, Limited (“Zohar III”) (9261), Zohar II 2005-1, Limited (“Zohar II”) (8297), and Zohar CDO 2003-1, Limited (together with Zohar II and Zohar III, the “Zohar Funds” or the “Funds”) (5119). The Debtors’ address is c/o FTI Consulting, Inc., 1166 Avenue of the Americas, 15th Floor, New York, NY 10036.

PATRIARCH PARTNERS VIII, LLC;
PATRIARCH PARTNERS XIV, LLC;
PATRIARCH PARTNERS XV, LLC;
OCTALUNA LLC; OCTALUNA II LLC;
OCTALUNA III LLC; PATRIARCH
PARTNERS AGENCY SERVICES, LLC; and
PATRIARCH PARTNERS, LLC,

Counterclaim and Third-
Party Claimants,

-against-

ZOHAR CDO 2003-1, LIMITED; ZOHAR CDO
2003-1, CORP.; ZOHAR II 2005-1, LIMITED;
ZOHAR II 2005-1, CORP.; ZOHAR III,
LIMITED; ZOHAR III, CORP.,

Counterclaim and Third-
Party Defendants.

**NOTICE OF FILING OF PROPOSED REDACTED VERSION OF
DEFENDANTS' SECOND AMENDED ANSWER TO THE CORRECTED
SECOND AMENDED COMPLAINT AND DEFENDANTS' AMENDED
COUNTERCLAIMS AND THIRD-PARTY CLAIMS**

PLEASE TAKE NOTICE that, on June 18, 2022, the **Defendants' Second Amended Answer to the Corrected Second Amended Complaint and Defendants' Amended Counterclaims and Third-Party Claims** [Adv. Docket No. 188] (the "Second Amended Answer") was filed under seal with the Court.

PLEASE TAKE FURTHER NOTICE that pursuant to Del. Bankr. L.R. 9018-1(d)(ii), attached hereto as Exhibit A is the proposed redacted public version of the Second Amended Answer.

Dated: July 28, 2022

COLE SCHOTZ P.C.

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– and –

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XIV, LLC, Patriarch Partners XV, LLC, Phoenix
VIII, LLC, Octaluna LLC, Octaluna II LLC,
Octaluna III LLC, Ark II CLO 2001-1, Ltd., Ark
Investment Partners II, LP, Ark Angels VIII, LLC,
Patriarch Partners Management Group, LLC, and
Patriarch Partners Agency Services, LLC*